

December 28, 2012

PERMIAN ELECTRONICS, INC.
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Submitted on behalf of:

Hunt Oil Company
200 N. Loraine Street
Midland, TX 79701
Callsign: WNDZ930

Office of the Secretary
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Request for Waiver of FCC Narrowbanding Requirement
FCC WT Docket No. 99-87

Dear Madame Secretary:

Hunt Oil Co., pursuant to Section 1.925 of the Federal Communications Commission ("FCC") rules and Public Notice, DA 11-1189¹ is hereby requesting a waiver of FCC Rule Section 90.209(b)(5). Hunt Oil Co. requests a limited extension of three (3) months² to the January 1, 2013, narrowbanding requirement that was established pursuant to WT Docket No. 99-87³. In support of this waiver request, we are submitting the following information.

¹ Wireless Telecommunications Bureau, Public Safety and Homeland Security Bureau, and Office of Engineering and Technology Provide Reminder of January 1, 2013, Deadline for Transition to Narrowband Operations in the 150-174 MHz and 421-512 MHz Bands and Guidance for Submission of Requests for Waiver and Other Matters, *Public Notice*, DA 1101189, released July 13, 2011.

² To April 1, 2013.

³ See Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Second Report and Order and Second Further Notice of Proposed Rulemaking*, WT Docket No. 99-87, RM-9332, 18 FCC Rcd 3034 (2003) ("Second R&O"); Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Third Memorandum Opinion and Order, Third Further Notice of Proposed Rule Making and Order*, WT Docket No. 99-87, RM-9332, 19 FCC Rcd 2-545 (2004) ("Third MO&O"); Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Order*, WT Docket No. 99-87, RM-9332, 25 FCC Rcd 8861 (2010) ("Narrowbanding Waiver Order").

Scope of Hunt Oil Company's Wireless Operations (System Size and Complexity)

Hunt Oil Company's system consists of the following: 1- Repeater, 1- Fixed Base Station, 8- Mobiles, & 12 Mobile Voice Alarms. The radios and voice alarms are used to notify personnel of hazardous situations, monitor tank levels (oil & salt water), and produced natural gas. Since this system is in a rural area, it plays a critical roll in the protection of life and the environment. Due to terrain and the limited cellular infrastructure, these radios are the **only** means of communication to vital dispatch personnel. Without these radios in place, life threatening situations could arise with no means of communication. Furthermore, the environment could be at risk since many of the monitored locations reside on a watershed for the Brazos River.

Recent Initiatives

Hunt Oil Co. modified callsign WNDZ930 in May of 2010 to include a narrowband emission designator. In June of 2012, Hunt Oil Co. replaced the following, radio equipment with narrowband compliant devices: 1- Repeater, 1- Fixed Base Station, & 8- Mobiles. All that remained were the 12 Mobile Voice Alarms to meet the Jan 1, 2013 deadline. Afterwards, it was decided by Hunt Oil Co. to replace the 12, Mobile Voice Alarms with a more contemporary alarm system (this new system operates in the ISM band (FCC Part 15.247) of the spectrum). But, due to equipment delays and infrastructure build out issues, Hunt Oil Co. is currently unable to make the required Jan 1, 2013 deadline (please see Scope of Hunt Oil Company's Wireless Operations for the importance of this system). Without the replacement alarm system, no alarms will be present, and personnel, as well as the environment, could be at risk. Therefore, Hunt Oil Co. petitions the FCC for a three month extension. This extension will allow Hunt Oil Co. time to receive their equipment and complete the new infrastructure build out. During this time, our existing Voice Alarms could continue to protect life and the environment.


Implementation Strategy and Completion Dates

Hunt Oil Company's implementation approach involves replacing the 12, existing, Mobile Voice Alarms, with new ISM band (FCC Part 15.247) equipment. This encompasses construction of 2 small towers, and the installation of a new computerized alarm dispatch console. Hunt's plan involves replacing all 12 units by the end of February and the dispatch console by the end of March. As equipment is installed, the old, existing, Mobile Voice Alarms will be removed from the licensed 450MHz system. This will continue until all 12 units are phased out of operation. If Hunt's plan of action is accepted, all 12 Mobile Voice Alarms will be removed from the licensed 450MHz system before our proposed date of April 1, 2013. At which time, Hunt will be fully compliant with the narrowbanding mandate.

Considering the following plan to: 1) Remove the 12 Mobile Voice Alarms from Hunt Oil Company's current system 2) The efforts that have already been undertaken and those which are scheduled 3) The critical nature (risks to life & environment) of the current system, Hunt Oil Co. respectfully requests that the FCC act expeditiously to grant this waiver of the Commission's Rules and extend the narrowbanding deadline on Hunt Oil Company's callsign: WNDZ930 for three months.

**Permian Electronics, Inc.
on behalf of Hunt Oil Co.**

Respectfully submitted,

By: 
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Wireless Supervisor
Radios and SCADA Systems**

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